



# State of New Jersey

Christine Todd Whitman  
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.  
Commissioner

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
NO. P127638271

February 14, 2000

Mr. Louis A. Fantin, VP  
Lenox Incorporated  
100 Lenox Drive  
Lawrenceville, NJ 08648

Dear Mr. Fantin:

Re: Lenox China Facility  
NJPDES-DGW Permit & TCE Quarterly Ground Water Monitoring Report  
Galloway Township, Atlantic County

The New Jersey Department of Environmental Protection (Department), the U.S. Environmental Protection Agency (EPA) received the above referenced report dated December 1999 prepared by Gannett Fleming, Inc. on behalf of Lenox Incorporated (Lenox).

The regulatory agencies has reviewed the subject document, which contains the results of permit required detection ground water monitoring for the October-December 1999 quarter, TCE monitoring under the MOA, evaluations of the GAC treatment system and pump-and-treat capture zone. Inspection logs for the SWMUs, RCRA wells and recovery wells and field logs outlining the sample collection and preservation procedures performed by the sampling personnel are also included in the report.

The Department required Lenox to conduct a statistical analysis using the Mann-Whitney U-Test on the ground water results from the site sentinel wells to show compliance with the GWQC for TCE and it's breakdown products.

The October 1999 sampling results for the sentinel wells along Whitehorse Pike show exceedences of the GWQC for TCE in monitoring well MW-77 (3.3 ppb) and MW-79A (2.1 ppb). These are increases from the July 1999 sampling round concentrations of 2.66 ppb and 1.4 ppb respectively. The results of the Mann Whitney U-Test performed by Lenox on the last 8 quarters of data show that the null hypothesis is accepted for the wells MW-77 and MW-79A. Therefore, it cannot be concluded that TCE concentrations are decreasing at these wells.

The report also stated that problems were encountered with the pump-and-treat remediation system, resulting in intermittent shutdown during November and December of 1999.

The regulatory agencies have the following comments:



1. Figures 1 through 8 were missing from one of the two copies submitted for NJDEP review. Please make sure that both copies have all the necessary figures in future reports.
2. For future submittals, the analytical results for the TCE breakdown products must be presented in table form in the main text of the report.
3. Lenox must provide specific details regarding the problems encountered with the pump-and-treat system, how long the system was shut down and how and when the problems were fixed. This is important because it brings into question whether the system has been operating at an optimal level over the past three quarters to allow full capture of the TCE plume by the recovery well system. The Department's concern is that TCE concentration increases in the Whitehorse Pike wells might be the result of contaminants moving past the recovery well system as opposed to pre-existing residual contamination that was beyond the capture zone of the recovery wells. In addition to providing quarterly ground water maps, Lenox needs to consider other methods to demonstrate that plume containment is complete, such as a tracer test. As a further note, if the system was shut down for a period of time, there is a good chance that a portion of the plume may have migrated beyond the zone of capture. If this is the case, contaminant levels in the Whitehorse Pike wells may continue to increase over the next several rounds.
4. With respect to the contaminant exceedences in the 2 Whitehorse Pike wells and the possible responses to those exceedences, the Department suggests waiting until the January 2000 sampling results are in before taking any possible remedial actions. However, the Department's concerns as stated in comment #3 above must still be addressed regardless of the January results. Installing additional sentinel wells downgradient of the Whitehorse Pike wells is a feasible first step alternative if subsequent ground water data continue to show increases in TCE concentrations.

Should you have any questions, please contact me at (609) 984-4071.

Sincerely,



Frank Faranca, Project Manager  
Bureau of Case Management

C: Andrew Park, USEPA, Region II  
Daryl Clark, NJDEP/DPFSR/BGWPA

**From:** Frank Faranca <ffaranca@dep.state.nj.us>  
**To:** R2NYC06.R2DEPDIV (PARK-ANDY)  
**Date:** 1/18/00 7:21am  
**Subject:** Lenox -Reply

**\*\* High Priority \*\***

Andy,  
Although we have not completed our review, I tend to agree with your assessment of the situation. I will keep you posted on the status of our review.  
Frank